

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JOHN RUDOLF,

Plaintiff,

v.

AMERICAN INTERNATIONAL  
GROUP, INC., NATIONAL UNION  
FIRE INSURANCE COMPANY OF  
PITTSBURGH, PA., and  
ALEXANDER BAUGH,

Defendants.

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: Civil Action No. 2:19-cv-01468  
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: Magistrate Judge Maureen P. Kelly  
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**MOTION FOR SUMMARY JUDGMENT**

Defendants American International Group, Inc. (“AIG, Inc.”), National Union Fire Insurance Company of Pittsburgh, Pa., (“National Union”), and Alexander Baugh (“Baugh,” and together with National Union and AIG, Inc., “Defendants”), move for summary judgment as to Plaintiff, John Rudolf’s (“Plaintiff”), claims (I-XV) set forth in his Amended Complaint (ECF 41).

Plaintiff filed this action on November 11, 2019. Plaintiff filed an Amended Complaint on October 29, 2020 alleging claims under the: Sarbanes-Oxley Act of 2002, 18 U.S.C. § 1514A; Pennsylvania Whistleblower Law, 43 P.S. § 1423 et seq.; False Claims Act, 31 U.S.C. § 3730(h); Age Discrimination in Employment Act of 1967; Pennsylvania Human Relations Act, 43 Pa.C.S. § 951, et seq.; Title VII of the Civil Rights Act, 42 U.S.C. § 2000e et seq.; Equal Pay Act, 29 U.S.C. § 206, et seq.; as well as common law claims of fraud, wrongful discharge and breach of contract, as well as a claim for intentional interference with a contractual relationship solely against Baugh.

Plaintiff’s claims based on the aforementioned statutes fail because, based on the undisputed evidentiary record, Plaintiff cannot establish a prima facie case as to any of those claims

and, even if he could, Plaintiff cannot rebut Defendants' legitimate, lawful reasons for their action. In addition, Plaintiff's common law claims fail because, based on the evidentiary record, Plaintiff cannot meet his burden to prove each of the elements of those claims.

Based on the undisputed record evidence and for the reasons set forth more fully in Defendants' accompanying Brief in Support, the parties' Joint Statement of Undisputed Facts, Defendants' Concise Statement of Material Facts, and the evidentiary support set forth in the Appendix filed herewith including exhibits attached thereto, the Court should grant summary judgment in favor of Defendants on all of Plaintiff's claims.

WHEREFORE, Defendants respectfully request that this Court grant summary judgment with respect to all of Plaintiff's claims.

Dated: August 9, 2022

Respectfully submitted,

/s/ Kevin B. Leblang

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